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Attorneys for Plaintiffs **Ludovic Michaud, Christine
Namagembe and John Bosco Kateregga**

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

LUDOVIC MICHAUD, an individual,
CHRISTINE NAMAGEMBE, an
individual, JOHN BOSCO
KATEREGGA, an individual;

Plaintiffs,

vs.

UNITED STATES, a government entity

Defendant.

**PLAINTIFFS' LIST OF EXPERTS AND
SUBJECTS OF EXPERTISE**

Case No. 2:21-cv-00722-BSJ

Honorable Judge Bruce S. Jenkins

Pursuant to DUCivR 26-1(b)(1)(A)(i), Plaintiffs hereby provides the following list of experts disclosed to Defendant's counsel along with each expert's subject of expertise:

Expert Witnesses Retained to Provide Expert Testimony:

Rene Castaneda, P.E.

Castaneda Engineering
4652 East Carmen Avenue
Fresno, California 93703

Subject of expertise: Mr. Castaneda is a professional engineer is a registered professional engineer with expertise in mechanical engineering, and the investigation and reconstruction of vehicular collisions. Mr. Castaneda will testify on issues pertaining to liability and causation, including but not limited to engineering reconstructions of the subject incident, the inspection and documentation of the subject vehicle and swing gate involved in the subject incident, 3D laser scanning, photogrammetric analyses, and 3D CAD diagrams to illustrate analysis and opinions formed, including speeds, distances, positions, paths and times related to the subject incident and other areas related to his expertise. He is expected to testify that the cause of the subject collision was the unsecured metal gate swinging suddenly and without

warning into the Plaintiff's vehicle, and that Plaintiff Ludovic Michaud was at all times operating his vehicle in a reasonable manner.

Peter Formuzis, Ph.D.

Formuzis, Hunt & Lanning
1851 East First Street, Suite 1160
Santa Ana, California. 92705

Subject of expertise: Dr. Formuzis is an expert economist with a Ph.D. in economics. He will testify on issues pertaining to damages, including, but not limited to, his computation of past and future economic damages sustained by Plaintiffs as a result of the death of Decedent Esther Nakajjigo, including her lost earning capacity and other areas related to his expertise.

Kenneth D. Martin

9616 Sweet Palm Court
Las Vegas, Nevada 89178

Subject of expertise: Mr. Martin is an expert in the design, manufacture, installation, operation, maintenance, and inspection of metal swinging gates such as the one at the entrance/exit of Arches National Park, and the standards, codes, regulations, and rules applicable to such gates. He will testify on issues pertaining to liability, including, but not limited to, the deficiencies and poor condition of the subject gate arm and resting post on the day of the incident, the lack of proper design, installation, inspection, maintenance, and operation of the gate arms, the lack of any appropriate securing or locking mechanisms, the lack of appropriate markings, the dangerous condition caused by the metal gate and arms, and other areas related to his expertise.

Rick Sarkisian, Ph.D.

Valley Rehabilitation Services, Inc.
545 East Alluvial Avenue, Suite 116
Fresno, California 93720-2826

Subject of expertise: Dr. Sarkisian is a vocational rehabilitation expert who has an

M.B.A. and Ph.D. in Education. He will testify as to issues relating to causation and damages within his areas of expertise, including but not limited to his assessment of the lost earning capacity and future employability of Plaintiffs' decedent Esther Nakajjigo. He is expected to testify that, because Esther Nakajjigo was extraordinary and unique, her earning potential was likewise extraordinary and unique. He will testify as to his evaluations and assessments of the earning capacities of comparable leaders, influencers and reality TV stars in their respective fields.

Mark Shattuck, Ph.D.

Kinetic Engineering

P.O. Bo 620808

Woodside, California 94062

Subject of expertise: Dr. Shattuck is an expert in the area of biomechanics, human factors, and accident reconstruction from a biomechanical perspective. He will testify on issues relating to liability and causation, including but not limited to his investigation and biomechanical reconstruction of the incident, biomechanical and human factors issues relating to the biomechanics relating to the injuries sustained by Plaintiffs' decedent Esther Nakajjigo, the points of impact and amounts of force on Plaintiffs' decedent Esther Nakajjigo's body, the manner in which the gate arm entered the subject vehicle and interacted with both Esther Nakajjigo and Plaintiff Ludovic Michaud, the zone of danger and other areas related to his expertise.

Expert Witnesses Not Retained or Specially Employed to Provide Expert Testimony:

Sergeant C Brewer

Grand County Sheriff's Office

25 S 100 E

Moab, UT 84532

Subject of expertise: Sergeant Brewer was one of the responding officers from Grand County

Sheriff's Office to the subject incident. He will testify about the results of his investigation, measurements taken at the scene, photographs and videos that were taken or reviewed in connection with this investigation, his review of witness statements and his overall conclusions.

Officer Joshua Honour

Grand County Sheriff's Office
25 S 100 E,
Moab, UT 84532

Subject of expertise: Officer Honour was the investigating officer from Grand County Sheriff's Office of the subject incident. He will testify about the results of his investigation, measurements taken at the scene, photographs and videos that were taken or reviewed in connection with this investigation, his review of witness statements and his overall conclusions. Officer Honour concluded that Ludo Michaud acted reasonably on the day in question and did not violate any road safety rules. Officer Honour confirms that the swing gate in question was not secured on that day to the receiving post. Officer Honour was deposed on February 14, 2022.

Karen DrKrueger

Grand County Attorney's Office
125 E. Center Street
Moab, UT 84532

Subject of expertise: Ms. DeKruger has almost thirty years of experience as a victim advocate. She was called to the scene on the day in question and assisted Ludo Michaud in the aftermath of the death of Esther Nakajjigo as a victim advocate. She observed his emotional distress and significant mental anguish. Karen DeKruger was deposed on February 17, 2022.

Pamela S. Ulmer, D.O.

Assistant Medical Examiner for the State of Utah
Utah Department of Health
Office of the Medical Examiner
4451 South 2700 West
Taylorsville, Utah 84129

Subject of expertise: Dr. Ulmer performed an autopsy on Esther Nakajjigo following her death


and issued a Report of Examination regarding the cause of her death. Dr. Ulmer formed opinions as to the cause and manner of Esther Nakajjigo's death and opined that she died from blunt force injuries. Her deposition was taken on February 17, 2022.

Emmanuelle Vaux-Lacrois
Clinical Psychologist
98 Rue Jean Jaures
Levallois-Perret, France

Subject of expertise: Dr. Vaux-Lacrois is a psychologist who has treated Plaintiff Ludovic Michaud since the day of the incident until the present date. She has diagnosed him as suffering from severe post traumatic stress disorder, with intense feelings of distress, nightmares, difficulty concentrating, a negative outlook on life, and a loss of interest in daily activities.

DATED: March 1, 2022

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